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Attorneys for Defendants
 PORTFOLIO LENDING, INC., and
 DONALD KUNG, an individual

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

COLONY INSURANCE COMPANY, a Virginia
 Corporation,

Plaintiff,

vs.

PORTFOLIO LENDING, INC., DONALD
 KUNG, an individual, and SAM LEONETTI, an
 individual,

Defendants.

CASE NO. 10-CV-00740-SC

**STIPULATION TO CONTINUE THE
 TRIAL DATE AND ~~PROPOSED~~
 ORDER**

The parties to the above entitled action hereby stipulate by and through their respective
 counsel of record herein that:

1. This is the first continuance of the Trial Date sought by the parties to the above-
 entitled action.

2. On September 17, 2010, the Parties attended a Case Management Conference in
 the above-entitled action. The Court set the following deadlines:

Discovery Cutoff : January 28, 2011

Motion Cutoff : February 18, 2011

Pre-Trial Conference : March 18, 2011

Trial : March 28, 2011

3. On October 7, 2010, Defendants PORTFOLIO LENDING, INC., and DONALD KUNG served their Initial Disclosures and Request for Production of Documents, Set One, which was propounded upon Plaintiff. Plaintiff served its Initial Disclosures on November 30, 2010 and completed its document production on December 13, 2010.

4. Plaintiff and Defendants PORTFOLIO LENDING, INC., and DONALD KUNG agree that there is insufficient time for the parties to notice and complete depositions by the January 28, 2011, discovery cutoff. The parties have explored and discussed scheduling of depositions. Due to scheduling and calendaring constraints, the parties believe that they cannot complete depositions and/or file dispositive motions without a 45-day extension of all deadlines.

5. Therefore, the parties request a continuance of the Trial Date and extension of all court-ordered deadlines as follows:

Discovery Cutoff	:	March 14, 2011
Motion Cutoff	:	April 4, 2011
Pre-Trial Conference	:	May 2, 2011
Trial	:	May 12, 2011

It is so stipulated.

DATED: December 21, 2010

CHARLSTON, REVICH & WOLLITZ,
LLP

/s/ Alan Lazar

By: _____

ALAN H. LAZAR
Attorney for Plaintiff COLONY
INSURANCE COMPANY

DATED: December 21, 2010

YARON & ASSOCIATES

/s/ Henry Su

By: _____

GEORGE D. YARON
HENRY M. SU
MATTHEW A. ZAVALA
Attorneys for Defendants Portfolio Lending,
Inc., and Donald Kung, individually

1 DATED: December 21, 2010

LAW OFFICE OF MICHELLE L. MCGILL

2 /s/ Michelle McGill

3 By: _____

MICHELLE L. MCGILL

4 Attorneys for Defendant Sam Leonetti

5 IT IS HEREBY ORDERED THAT:

6 The Trial Date and all court-ordered deadlines are hereby continued to the following
7 dates:

8 Discovery Cutoff : March 14, 2011

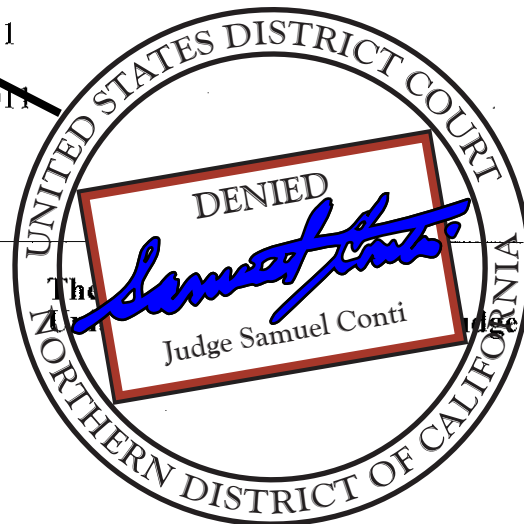
9 Motion Cutoff : April 4, 2011

10 Pre-Trial Conference : May 2, 2011

11 Trial : May 12, 2011

12
13 DATE: December 27, 2010

By: _____



CERTIFICATE OF SERVICE

I am over 18 years of age and not a party to the within action. I am employed in the County of San Francisco; my business address is **Yaron & Associates, 601 California Street, Suite 2100, San Francisco, California 94108.**

On **December 21, 2010**, I served the within:

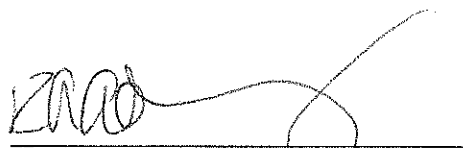
STIPULATION TO CONTINUE THE TRIAL DATE AND [PROPOSED] ORDER

on all parties in this action, as addressed below, by causing a true copy thereof to be distributed as follows:

TO ALL PARTIES ON THE ECF SERVICE LIST

✱ **VIA ELECTRONIC SERVICE:** I served a true copy, with all exhibits, electronically on designated recipients through PACER. Upon completion of electronic transmission of said document(s), a receipt is issued to serving party acknowledging receipt by PACER's system. Once PACER has served all designated recipients, proof of electronic service is returned to the filing party which will be maintained with the original document(s) in our office. This service complies with CCP §101.6.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **December 21, 2010**, at San Francisco, California.


K. A. ADAMS
kadams@yaronlaw.com